

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TRUSTEES OF THE SUBURBAN TEAMSTERS)		
OF NORTHERN ILLINOIS WELFARE AND)		
PENSION FUNDS,)		
)		
Plaintiffs,)		
)		Case No.: 25 C 2872
v.)		
)		Judge April M. Perry
)		
DRQ ENTERPRISES, INC.)		
an Illinois corporation not in good standing,)		Magistrate Judge Laura K. McNally
)		
Defendant.)		

MOTION FOR JUDGMENT IN SUM CERTAIN ON COUNT I

NOW COME the Plaintiffs, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUND, by and through its attorney, JOHN J. TOOMEY, ARNOLD AND KADJAN, LLP and pursuant to FRCP 55(b)(2) move for judgment in sum certain as stated in this Motion and the supporting Affidavits attached hereto as Exhibits 1 and 2. In support of its Motion, Plaintiffs state as follows:

1. Suit was filed on March 19, 2025 for collection of delinquent contributions plus attorneys' fees, costs and interest under 29 U.S.C. 1132(g)(2). An Amended Complaint was filed on May 1, 2025.
2. Service was made upon DRQ ENTERPRISES, INC., an Illinois corporation not in good standing on April 14, 2025.
3. Defendant is now in default on the Amended Complaint and as supported by the attached Affidavits (Exhibits 1 and 2) the sums due are:

\$7,125.93	Welfare
\$10,549.10	Pension
\$1,250.00	Attorneys fees
\$475.00	Court costs
\$19,400.03	Total

WHEREFORE, Plaintiffs pray for:

1. Entry of judgment in a sum certain against Defendant, DRQ ENTERPRISES, INC., an Illinois corporation not in good standing, and in favor of Plaintiffs, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS PENSION AND WELFARE FUNDS in the amount of \$19,400.03 with no just reason for delay in enforcement under FRCP 54(b).

TRUSTEES OF THE SUBURBAN TEAMSTERS
OF NORTHERN ILLINOIS PENSION AND
WELFARE FUNDS

s/John J. Toomey
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